

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CLYDE E. MEASE, JR.,)	
)	
Plaintiff,)	C.A. No.: 06-271 (XXX)
)	
v.)	
)	Trial By Jury Demanded
WILMINGTON TRUST COMPANY)	
)	
Defendant.)	

JOINT MOTION FOR AMENDMENT OF SCHEDULING ORDER

The parties hereto, by Counsel, hereby request that the Scheduling Order in the captioned action be amended in accordance with the attached Proposed Order for the following reasons:

The Scheduling Order was entered on November 8, 2006 providing that all discovery was to be due by June 29, 2007.

Motions to dismiss certain claims had been filed and the parties delayed proceeding with discovery until the said motions were decided.

The Court issued a memorandum order on March 26, 2007 and on March 29, 2007, Plaintiff filed a Motion for Reconsideration of the Order and Defendant filed a response to that motion on April 5, 2007.

Subsequently the parties agreed to proceed with discovery pending disposition of the said Motion for Reconsideration, but both parties agree that insufficient time remains for proper discovery to be conducted and completed.

The parties stipulate, with the Court's permission that the Scheduling Order be amended as follows:

Discovery Cut Off	October 1, 2007
Opening Brief on Motion for Summary Judgment	October 30, 2007
Answering Brief on Motion for Summary Judgment	November 21, 2007
Reply Brief on Motion for Summary Judgment	December 12, 2007
Pretrial Conference	As Scheduled by the Court
Trial	As Scheduled by the Court

Respectfully Submitted.

ABER, GOLDLUST, BAKER & OVER YOUNG, CONAWAY STARGATT & TAYLOR

/s/ Gary W. Aber
Gary W. Aber
702 King Street, Suite 600
P.O. Box 1675
Wilmington, DE 19899
(302) 472-4900
Attorney for Plaintiff

/s/ Sheldon N. Sandler
Sheldon N. Sandler
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899
(302) 571-6673
Attorney for Defendant

SO ORDERED, this _____ day of _____, 2007

J.